



## Appendix C Purchasing Policy

### Document Summary

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<b>Governing Committee</b>	Board of Directors
<b>Statutory or Optional policy:</b>	Statutory

### Amendment History

Version	Amendment Date	Author	Amendment Summary
1	October 2023	Kim Bowgin	New policy - approved by Board of Directors

### **1) Purpose of the Policy**

The purpose of this policy to ensure that the Trust obtains the best value for money taking into account quality, service, operational needs, delivery, timeliness, and supplier performance. In more specific detail this means:

- that goods/services are of the right specification and of a standard which will ensure adequate quality and fitness for the intended purpose; and
- that goods/services purchased satisfy operational requirements and that the techniques employed in all stages of the purchasing process are aimed at maximising value for money obtained.

### **2) Consultation process**

This policy was developed in consultation with the FAR Committee.

### **3) Relationship to other policies**

Financial Regulations Manual  
Appendix A - Scheme of Delegation  
Appendix D – Charge Card Policy  
Appendix H – Staff Expenses Policy  
Appendix I – Trustee and Governor Expenses Policy  
Code of Conduct  
Fraud Policy  
Declarations of Interest Policy

### **4) Purchasing Procedures**

#### **Authority to Purchase**

Authority to purchase is delegated to the budget holders in line with the Scheme of Delegation – Appendix A of the Financial Regulations Manual. Each academic year the Finance Leads for each school will obtain a new list of specimen signatures for all budget holders in their schools and will retain this information in their Finance Department and send a copy to the Central Finance Team who will file centrally.

#### **Purchasing Procedure**

- All purchasing activity is subject to compliance with the Trust's Financial Regulations Manual and Scheme of Delegation with regard to levels of expenditure and the procedures to be followed.
- Where applicable, purchases should be sourced through existing/known suppliers especially where discounts have been negotiated on behalf of the Trust.

## Appendix C to the Financial Regulations Manual

- Should the value of the intended purchase exceed £50,000 the order must be tendered as per the Financial Regulations Manual. Use of buying frameworks is recommended and the CFO must be consulted to support financial planning, before the tendering process begins.
- Details of purchasing thresholds can be found in the Scheme of Delegation. Where quotes cannot be obtained in line with the Scheme of Delegation, a Procurement Exception Form should be completed.
- All relevant legislation and Health and Safety requirements must be satisfied in full, prior to the purchase of goods/services. This includes relevant insurance/warranty where applicable.

### **Purchasing at School Level**

- It is the responsibility of the school budget holders to manage their budget and to ensure that the funds available are not overspent.
- The school budget holders must ensure that the purchase of any item is essential to the operations of the Trust.
- The budget holder must ensure that they follow the purchasing procedure as detailed in the Financial Regulations Manual under section 6. "Purchasing" and to ensure that value for money is secured.
- All purchases must be authorised by the relevant budget holder prior to the order being placed. This includes any items purchased from which reimbursement from the school/Trust will be requested or to be paid via a charge card (see separate appendices F, G & H for further details).
- Members of staff should not purchase items from their own money and request reimbursement at a later stage. They should purchase goods through the normal purchasing procedures in each school through the finance team (see appendix H – Staff Expenses).
- Alcohol for consumption in any form (e.g. liqueur chocolates) must not be purchased using school or Trust funds.

### **Supplier Assessment**

The Trust has an existing list of preferred suppliers which should be used where possible to do so.

Suppliers that are used to perform a service or any maintenance work on any school equipment should provide the following details prior to commencing work:

- a copy of their current public liability insurance;
- a copy of their safety policy;
- a safe practice of work document and/or risk assessment of work to be undertaken;
- evidence of professional competence such as qualifications and/ or membership to a relevant trade or professional organisation; and
- confirmation that staff regularly visiting the schools have undergone a recent DBS check and safeguarding training.

### **Purchasing Ethics**

A large proportion of purchases will be paid for with public funds and budget holders need to maintain the integrity of these funds by following the general principles of:

- **Probity**, it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the Trust;
- **Accountability**, the Trust is publicly accountable for its expenditure and the conduct of its affairs; and
- **Fairness**, that all those dealt with by the Trust are dealt with on a fair and equitable basis.

Everyone involved in purchasing activities should observe the following:

### **Declaration of interest**

All members of staff are required to complete a “pecuniary interest declaration” form annually to declare any interest they have which may conflict with their position in the Trust particularly in relation to purchasing and authorisation of purchasing.

### **Confidentiality of Information**

The confidentiality of information received in the course of their duty should be respected and specific details of suppliers’ offers must not be divulged to competitors. The information should never be used for personal gain.

### **Relationships with Suppliers**

Any arrangement which may prevent the effective operation of fair competition should be avoided.

### **Gifts and Hospitality**

All gifts or hospitality must be declared and recorded in the Gifts and Hospitality Register within 28 days. To register gifts or hospitality members of staff must inform the Head of Business Operations in writing and provide the following information:

- name of recipient;
- details of gift/hospitality;
- approximate value;
- date received/declined;
- provider of gift/hospitality.

## Appendix C to the Financial Regulations Manual

The presumption behind this policy is that members of staff may not solicit or accept any form of gift or hospitality from any parent/carer, applicant, supplier, contractor, or consultant with whom The Trust is dealing or could possibly be dealing. In particular:

- no gift or hospitality of any kind may be accepted by a member of staff in any circumstances where there is any possibility that the donor intends that it should secure benefit for the donor;
- no gift or hospitality may be accepted by a Director, governor, or committee member with the exception of those set out below.

The exceptions are:

- inexpensive gifts such as those traditionally given at Christmas - by way of guideline any gift that has greater value than approximately £20 should be declined. Any gift in excess of this should be returned to the donor explaining that it is The Trust's policy not to accept such gifts;
- collective gifts - There may be circumstances where a group of individuals collectively buys a gift of greater value than indicated above perhaps to mark a special occasion. Such gifts may be accepted with the consent of the Executive Management team;
- modest hospitality in connection with a business meeting or event. By way of guideline members of staff decline to accept hospitality that The Trust (as a public body and education provider) could not reasonably be expected to reciprocate;
- hospitality provided as part of a conference or seminar where food and drinks may be sponsored by a company but is part of the event.

There are some forms of hospitality that are completely unacceptable, and these include:

- holidays;
- the use of accommodation for private use;
- personal invitations to any event that is not related to the member of staff's duties.

Occasionally members of staff may be invited to daytime or evening corporate hospitality events provided by organisations which may or may not have dealings with the Trust. These can take many forms and should usually be declined unless the event is an opportunity to network with existing or potential business partners and declining might place the Trust at a competitive disadvantage. In such circumstances then the CEO will decide on attendance. Care must be taken to ensure that the event is not used to influence members of staff.

Where the Trust is in any form of tendering or contractual negotiations with an organisation offering hospitality, it should always be declined.

This list is not exhaustive. If there is any doubt regarding the acceptability of gifts or hospitality, then the matter should always be referred to the CFO or CEO for advice before being accepted.

**5) Monitoring and Evaluation**

The Trust will review this policy every year and assess its implementation and effectiveness.

Board and/or Committee members will oversee the internal audit arrangements; providing the appropriate level of support and challenge to ensure that the agreed practice and procedure has been implemented through:

- Scrutiny of all reporting information requested and received
- Identification of any associated risks, trends, underlying or contributory factors
  
- Assessing any opportunities for change to enhance existing practice and achievement of the Trust's vision
- Making decisions in respect of any proactive and/or mitigating action to be taken
- Evaluating the impact and effectiveness of policy and practice in line with the agreed policy review schedule or as necessary.